Case 1:07-cv-07654-PKC-DCF

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Mr. Keith Thomas Cox #07-A-4927 Orleans Correctional Facility 3531 Gaines Basin Road Albion, New York 14411-9199 June 3rd, 2008

JUN - 2003

MEMO ENDORSED

Honorable Debra Freeman
United States Magistrate Judge
Southern District Of New York
Daniel Patrick Moynihan
United States Courthouse - Room 525
500 Pearl Street
New York, New York 10007-1312

6/9/08

RE: COX v. NAT'L PASSENGER RAILROAD CORP., ET AL.,

07-CIV- 7654 (PKC) (DF)

Dear Honorable Freeman:

Formally, I am writing pursuant to the above-mentioned docketed case; because, I am presently strained due to the obligations I have to perform regarding Departmental regulations for programs, in which, is complicating my ability to respond to the Defendant's request within a reasonable amount of time since under these responsibilities (i.e., Law Library Clerk, and, General Business Student) there is not enough time in a day for me to fulfill those obligations as well as my own legal responsibilities.

Your Honor, therefore, I am requesting additional time to respond as well as complete my own set of interrogatories for the Defendant's to respond to as well; thus, it seems since the phone conference held on the 5th day of May, 2008, A.D.A. Michael S. Morgan, has failed to forward the transcripts of the preliminary proceedings regarding the arraignment up until the dismissal of the instant charges relating to the case, to which, has brought about this civil action. Further, attorney Ronald E. Joseph, for Defendant's Nat'l Railroad Passenger Corp., and Ron Hunte, Amtrak Police Officer, keeps hampering me for documents that are not in my possession and also states that my responses to the overly broad First Set of Interrogatories, are not sufficient though I provided enough information for him to follow up on. [See, Local Civil Rule 26 (a)(1)(e), and, 33.3]

Additionally, presently I am doing my best to answer each and every request that has been served upon me by either party without any delay, but, as previously mentioned I am

The court will address any envises ayarding discover scheduling at the next conference.

SO ORDERED:

DATE: 6/9/08

DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE

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formally requesting an extension of at least twenty (20) days to complete discovery in every possible aspect since there are pertinent questions that need to be resolved within interrogatory questions that the Honorable Court should be made aware of pursuant to certain defendant's in this action especially where they relate to circumstances systematically being avoided by the parties attorney's regarding certain conduct of specific defendant's..

Your Honor, Wherefore, it is prayed that this Honorable Court grant the relief requested, and, for any other and further relief that the Court finds just, equitable and proper, in regards, to the circumstances addressed herein. Further, by the date of notarization of this correspondence each Defendant's attorney shall have been served a copy of this request.

Respectfully Submitted.

THOMAS

SWORN TO BEFORE ME THIS

DAY OF

NOTARY PUBLIC MARK G. WELLS

Notary Public, State of New York Qualified in Orleans County

No. 01WE6134974 TO Commission Expires Oct. 11, 20

> TIMOTHY G. RONAN PULLMAN & COMELY, LLC 300 ATLANTIC STREET STAMFORD, CT 06901

RONALD E. JOSEPH CORSI BALLAINE LANDMAN & FORD, P.C. 120 BROADWAY - 27TH FLOOR NEW YORK, NEW YORK 10271

A.D.A. MICHAEL S. MORGAN NEW YORK COUNTY DISTRICT ATTORNEY OFFICE ONE HOGAN PLACE NEW YORK, NEW YORK 10013